1 2 3 4 5 6 7 8 9 10 11 12 13	Carol A Sobel SBN 84483 Weston Rowland SBN 327599 Law Office of Carol A. Sobel 2632 Wilshire Boulevard, #552 Santa Monica, CA 90403 t. (310) 393-3055 e. carolsobellaw@gmail.com e. rowland.weston@gmail.com  David Loy SBN 229235 Aaron R. Field SBN 310648 First Amendment Coalition 534 4th St., Suite B San Rafael, CA 94901 t.(415) 460-5060 e. dloy@firstamendmentcoalition.org e. afield@firstamendmentcoalition.org  Peter Bibring SBN 223981 Law Office of Peter Bibring 2140 W Sunset Blvd # 203, Los Angeles, CA 90026 t.(213) 471-2022 e. peter@bibringlaw.com	Paul Hoffman, SBN 71244 Michael Seplow, SBN 150183 John Washington, SBN 315991 Schonbrun, Seplow, Harris, Hoffman & Zeldes LLP 200 Pier Avenue #226 Hermosa Beach, California 90254 t.(310) 396-0731 e. hoffpaul@aol.com e. mseplow@sshhzlaw.com e. jwashington@sshhlaw.com  Susan E Seager SBN 204824 Law Office of Susan Seager 128 N. Fair Oaks Avenue Pasadena, CA 91103 t. (310) 890-8991 e. susanseager1999@gmail.com
14	UNITED STATES I	DISTRICT COURT
14	OMILD SIMILS	DISTRICT COUNT
15	CENTRAL DISTRICT OF CALII	FORNIA – WESTERN DIVISION
15 16 17	CENTRAL DISTRICT OF CALIL LOS ANGELES PRESS CLUB, STATUS COUP,	Case No. 2:25-CV-05423-HDV-E
16	LOS ANGELES PRESS CLUB,	
16 17	LOS ANGELES PRESS CLUB, STATUS COUP, PLAINTIFFS,	Case No. 2:25-CV-05423-HDV-E
16 17 18	LOS ANGELES PRESS CLUB, STATUS COUP,	
16 17 18 19	LOS ANGELES PRESS CLUB, STATUS COUP,  PLAINTIFFS,  v.  CITY OF LOS ANGELES, a municipal	Case No. 2:25-CV-05423-HDV-E
16 17 18 19 20 21	LOS ANGELES PRESS CLUB, STATUS COUP,  PLAINTIFFS,  v.  CITY OF LOS ANGELES, a municipal entity, JIM MCDONNELL, LAPD	Case No. 2:25-CV-05423-HDV-E HON. HERNÁN D. VERA
16 17 18 19 20 21	LOS ANGELES PRESS CLUB, STATUS COUP,  PLAINTIFFS,  v.  CITY OF LOS ANGELES, a municipal entity, JIM MCDONNELL, LAPD CHIEF, sued in his official capacity;	Case No. 2:25-CV-05423-HDV-E  HON. HERNÁN D. VERA  DECLARATION OF SEAN
16 17 18 19 20 21 22	LOS ANGELES PRESS CLUB, STATUS COUP,  PLAINTIFFS,  v.  CITY OF LOS ANGELES, a municipal entity, JIM MCDONNELL, LAPD	Case No. 2:25-CV-05423-HDV-E HON. HERNÁN D. VERA
16 17 18 19 20 21 22 23	LOS ANGELES PRESS CLUB, STATUS COUP,  PLAINTIFFS,  v.  CITY OF LOS ANGELES, a municipal entity, JIM MCDONNELL, LAPD CHIEF, sued in his official capacity;	Case No. 2:25-CV-05423-HDV-E  HON. HERNÁN D. VERA  DECLARATION OF SEAN
16 17 18 19 20 21 22 23 24	LOS ANGELES PRESS CLUB, STATUS COUP,  PLAINTIFFS,  v.  CITY OF LOS ANGELES, a municipal entity, JIM MCDONNELL, LAPD CHIEF, sued in his official capacity;	Case No. 2:25-CV-05423-HDV-E  HON. HERNÁN D. VERA  DECLARATION OF SEAN
16 17 18 19 20 21 22 23 24 25	LOS ANGELES PRESS CLUB, STATUS COUP,  PLAINTIFFS,  v.  CITY OF LOS ANGELES, a municipal entity, JIM MCDONNELL, LAPD CHIEF, sued in his official capacity;	Case No. 2:25-CV-05423-HDV-E  HON. HERNÁN D. VERA  DECLARATION OF SEAN

- 2 3
- 4 5

- 6 7
- 8

9

- 10
- 11
- 12 13
- 14
- 15 16
- 17
- 18
- 19 20
- 21
- 22
- 23 24
- 25
- 26 27
- 28

- 1. I, Sean Beckner-Carmitchel, hereby declare: I am a freelance multimedia journalist in the Southern California area and member of the Los Angeles Press Club. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:
- I have been working as a freelance journalist in the Southern California area for the past six years. I produce video and articles about a range of events and topics, with a focus on law enforcement agencies and public protests. My work has been published by various news organizations, including CNN, ABC's Good Morning America, The New York Times, CalMatters, the Beverly Hills Courier, Los Angeles Public Press, and Knock LA.
- 3. During several months in 2020, I reported about numerous public protests on the streets of Southern California over the police murder of George Floyd in Minnesota and other protests over local police killings and shootings in Southern California area. I reported about and filmed the protests and police actions against the protesters.
- 4. During June 2025, I reported about the public protests on the streets of Southern California over immigration sweeps by federal officers and the "No Kings" march on June 14, 2025. I reported about and filmed the protests and police actions against the protesters. I saw a definite difference between the way the Los Angeles Police Department acted towards journalists in June 2025 compared to 2020. In June 2025, the LAPD has been firing more less lethals, known as LLMs, at journalists compared to 2020, with a casual disregard with LLMs, and firing at journalists' heads. I've seen a lot more serious, visible injuries on journalists due to actions by the LAPD during the protests in June 2025 compared to 2020, many of which requires serious medical treatment or hospitalization. I am able to recognize LAPD officers by their cars that are marked "Los Angeles Police Department," and their dark blue uniforms, and arm patches. In contrast, the Los Angeles County

3

5

4

6 7

8

9

10 11

12

13

14

15

16

17

18

19 20

21

22

23 24

25

26

27

28

Sheriff's Department deputies wear light tan shirts and dark green pants as their uniform. I posted my videos and reporting on my account on the online social media platform BlueSky.

5. During the daytime on June 8, 2025, I was reporting about and filming a public protest and LAPD actions on Spring Street near Los Angeles City Hall and the Clara Shortridge Foltz Criminal Justice Center. I was wearing my credentials for my reporting company, ACatWithNews, a white helmet, was using a Sony A7iii camera, often used by professional news gathering videographers and photographers. I was with several other journalists who were carrying large cameras and similar professional equipment. Our group of journalists huddled in an entrance to a closed underground parking garage at the Clara Shortridge Foltz courthouse to stay out of the way of the LAPD and report about the protest and LAPD actions. But I and other journalists were forced to leave the parking garage entrance when the LAPD fired tear gas in Spring Street directly across from our location and physically entered the parking garage ramp and ordered journalists to leave. I posted my video and reporting about this incident on the online social media platform BlueSky. A true and correct copy of the video is attached as Exhibit 36. It is also available at

https://bsky.app/profile/acatwithnews.bsky.social/post/3lr5dzsokwc2i.

6. During this same incident on Spring Street on June 8, 2025, I and other journalists attempted to flee the LAPD by walking onto Spring Street in front of the Clara Shortridge Foltz courthouse, turning right on Spring Street, and walking into Grand Park in front of Los Angeles City Hall. I saw LAPD officers chase an unidentified woman photographer with multiple professional cameras and large lenses as well as press identification on a lanyard around her neck even though she was walking away from officers and trying to leave the area. One LAPD officer on foot pushed his hand against photographer's back as she was walking and then another officer horseback ran his horse into her from behind as

///

///

///

///

- 7. During this same incident on Spring Street on June 8, 2025 when I and other reporters attempted to flee the LAPD into Grand Park, I saw LAPD officers appeared to take pot shots with an LLM at an unidentified photographer with a yellow helmet holding up a professional camera to film the officers with other photography gear strapped to him, and what appeared to be some sort of identification on a lanyard which he was also holding in the air. The LLM landed in the bed of yellow flowers in front of him. I posted my video and reporting on the incident on the online social media platform BlueSky. A true and correct copy of the video of the incident is attached as **Exhibit 39**. It is also available at <a href="https://drive.google.com/file/d/1A5m2UNhs7PfcSbfWsikLYypvnxnMobO5/view">https://drive.google.com/file/d/1A5m2UNhs7PfcSbfWsikLYypvnxnMobO5/view</a>
- 8. During separate daytime incident on June 8, 2025, I was among a group of journalists carrying large cameras, tripods, headphones, and similar professional equipment who were filming and reporting about protesters walking in the intersection of Alameda and East Aliso streets in downtown Los Angeles when I heard LAPD order the press to leave the protest area. At least twice and as depicted in my video, I heard the LAPD scream at me and other journalists, "Media, go!" I posted my video and reporting on the incident on the online social ////

Document 20

Filed 07/03/25

Page 5 of 5 Page ID

Case 2:25-cv-05423-HDV-E